

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Dimon Leon ENGLAND

Case: 2:22-mj-30515

Assigned To : Unassigned

Case No.

Assign. Date : 12/6/2022

Description: CMP USA v. ENGLAND
(SO)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of On or 06/01/2022 through 12/06/2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 2242(b), 18 U.S.C. 2251(a)

Production of child pornography, including attempt and coercion and enticement

18 U.S.C. 2252A(a)(2), 18 U.S.C. 2252A(a)(5)(B)

Distribution, receipt, and possession of child pornography

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*Special Agent Laura Trainer - HSI*Printed name and title*Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: December 6, 2022City and state: Detroit, Michigan*Judge's signature*Hon. Jonathan J.C. Grey, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Laura Trainer, being first duly sworn, state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Department of Homeland Security Homeland Security Investigations (HSI) in Detroit, Michigan. I have been employed as a Special Agent for HSI since March 2007 and am currently assigned to the Cyber Crimes Group. While employed as a Special Agent by HSI, I have assisted with investigations related to child exploitation and child pornography. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. In June 2019, I successfully completed the International Crimes Against Children (ICAC) Undercover Chatting Investigations training held in Fairfax, Virginia. In August 2020, I attended the Crimes Against Children Conference hosted virtually by the Dallas Children's Advocacy Center.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Dimon Leon England** for violations of Title 18, United States Code, Sections 2242(b), which makes it a crime for any person to utilize the mail or any facility or means of interstate or foreign commerce, or

within the special maritime and territorial jurisdiction of the United States to knowingly persuade, induce, entice, or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or to attempt to do so; as well as Title 18, United States Code, Sections 2251(a), 2252A(a)(2) and 2252A(a)(5)(B), which make it a crime for any person to knowingly produce, receive, or possess child pornography that has been mailed, shipped, or transported in interstate or foreign commerce by any means, including by computer.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for **Dimon Leon England**.

4. Pursuant to the provisions of Title 18, United States Code, section 2256, “child pornography,” as used in this affidavit, includes any visual depiction,

including any photograph, film, video, picture, or computer generated image or picture of sexually explicit conduct where the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct.

BACKGROUND ON SNAPCHAT

5. Snapchat, Inc. is a mobile application made by Snapchat, Inc. and is available through the iPhone App Store and Google Play. The application provides a way to share moments with photos, videos, and text. Snapchat's differentiating feature from other communications applications is that the sender is able to set a variable amount of time the message is viewable by the receiver. This time can be between one and ten seconds. At the expiration of time, the message is deleted from Snapchat's servers. Similarly, the message disappears from the user's devices. If the receiver of a Snapchat message does not access the application on their device the message remains undelivered. Snapchat stores undelivered messages for 30 days. After 30 days the messages are deleted from the company's servers.

6. Snapchat users have the following abilities:

a. Snaps: A user takes a photo or video using their camera phone in real-time and then selects which of their friends to send the message to. Pictures and videos can also be sent from the saved pictures/videos in the gallery of the device. Unless the sender or recipient opts to save the photo or video, the message will be deleted from their devices (after the content is sent in the case of the sender and after it's opened in the case of the recipient). Users are able to

save a photo or video they've taken locally to their device or to Memories, which is Snapchat's cloud-storage service.

b. Stories: A user can add photo or video snaps to their "Story". Depending on the user's privacy settings, the photos and videos added to a Story can be viewed by either all Snapchatters or just the user's friends for up to 24 hours. Stories can also be saved in Memories. Our Stories is a collection of user submitted snaps from different locations and events. A Snapchat user, with the location services of their device turned on, can contribute to a collection of snaps regarding the event.

c. Memories: Snapchat's cloud-storage service. Users can save their sent or unsent Snaps, posted Stories, and photos and videos from their phone's photo gallery in Memories. A user can also edit and send Snaps and create Stories from these Memories. Snaps, Stories, and other photos and videos saved in Memories are backed up by us and may remain in Memories until deleted by the user.

d. Chat: A user can also type messages, send photos, videos, audio notes, and video notes to friends within the Snapchat app using the Chat feature. A user sends a Chat message to a friend, and once it is viewed by both parties – and both parties swipe away from the Chat screen – the message will be cleared. Within the Snapchat app itself, a user can opt to save part of the Chat by tapping on the message that they want to keep. The user can clear the message by tapping it again.

e. Snapcash: Snapchat also offers a money transfer service called Snapcash. Users are able to transfer up to \$2,500 per week using this service. Snapcash transactions are only permitted using Visa and Mastercard debit cards issued by a United States Financial Institution. Money transfers can only occur if the sender and receiver both have Snapchat installed and have linked an appropriate debit card to their accounts. To facilitate these transactions, Snapchat retains information about the method and source of payment including debit card information such as the card number, expiration date, CVV security code, and billing address zip code. Additionally, the company may have the date of birth and social security number of those involved in money transfers.

PROBABLE CAUSE

7. On August 9, 2022, a ten-year old female (herein referred to as Minor Victim 1 or MV-1) was forensically interviewed about being contacted via Snapchat by a user who asked her to send sexually explicit photos and videos of herself in exchange for "Robux", an in-game currency utilized in the game Roblox. Roblox is an online game platform and game creation system developed by Roblox Corporation that allows users to program games and play games created by other users. This interview was observed by Detective Swope from the Washington County Sheriff's Office in Maryland. MV-1 stated she is ten (10) years old and is going into the 5th grade. When asked if she knew why she was at the Child Advocacy Center, MV-1 stated, "I sent nudes to this guy who is probably old or older." MV-1 stated the male friended her on Snapchat sometime this summer. MV-1 explained they would communicate and send photos/videos via the chat feature in Snapchat. MV-1 stated she never met the person she was communicating with on Snapchat, and she assumed it was a male. MV-1 further stated she never saw the males face during any communication with him, and that the male told her he would pay her if she would send him "nudes." MV-1 stated he told her that he would give her Robux to use on the gaming platform Roblox. MV-1 stated she thought about sending the images and thought "it was for money so why not." MV-1 stated he told her that he would give her a \$25 gift card for

Robux to use for Roblox. MV-1 described that if she received the Robux she would use the money to build Avatars and other things on Roblox.

8. MV-1 was able to identify different body parts on the anatomical drawing that was shown to her. MV-1 identified the vagina as the "crotch." MV-1 stated that she sent photos of her vaginal area with her clothes off. MV-1 also stated she sent photos of her breast area with no clothes on. MV-1 stated she told the man that she was ten (10) years old, and that the man told her, " I like them young" when she told him her age.

9. MV-1 stated after she sent a few photos of her chest (5 photos) and over 10 photos including videos of her "crotch", the man asked her to put any objects she could find in her "crotch." MV-1 stated she put a toilet bowl brush in her "crotch" in one of the videos and used her hands in some of the videos to touch her "crotch" area.

10. MV-1 stated she met this male sometime after June 7th on Snapchat. MV-1 stated she went on a trip and when she returned the man stated she "disappeared" and asked for more photos. MV-1 explained that he would often call her a "slut" when they would chat. MV-1 stated the last time she sent photos was a few weeks ago. MV-1 stated she took the photos and videos at night while everyone in her house was asleep. MV-1 stated most photos and videos were taken in her bedroom, but some photos and videos were in the bathroom. MV-1 stated

she told her friend what she did, and the friend advised that she should not do that. MV-1 stated she then blocked the man's account on Snapchat and further stated she never received any money for the photos or videos she sent him. MV-1 was unsure of the man's Snapchat username, but she sent a screenshot of his screen name to a family member.

11. Following the interview, MV-1's family member showed the screenshot of the male's Snapchat username "jackj22549" (herein referred to as "Suspect Account 1" or SA-1) to the Detective Swope. MV-1's family member identified this Snapchat account username as the account MV-1 had been communicating with and sending photos.

12. On August 16, 2022, search and seizure warrants were authorized for MV-1 and SA-1's Snapchat accounts. Snap Inc provided the requested information for SA-1, which showed the account was created on June 16, 2022, and had been deactivated on August 4, 2022, and reactivated on August 7, 2022.

13. A review of SA-1 showed several images of MV-1 sitting on a toilet naked and videos of her inserting the handle of a toilet bowl cleaner and other objects into her vagina. Several "screenshot" images of an Amazon account listing several Roblox gift cards for various amounts was also observed. It appears the user of SA-1 was sending Roblox gift cards to numerous Snapchat accounts in exchange for sexually explicit images and videos. Several images and videos of

the minor aged females, including the images and videos of MV-1, met the federal definition of Child Pornography. Based on details contained within the chats, law enforcement believes the account was created and utilized by England in the Eastern District of Michigan.

14. The information was forwarded to HSI Detroit for further investigation. HSI Detroit Special Agent Laura Trainer reviewed the images and determined that they met the federal definition of child pornography.

15. After analyzing all conversations seen on the SA-1 Snapchat search warrant returns, identifiers given by the user of SA-1 include the following in sum and substance:

- Giving phone number as 313-802-9779
- Stating they drive a Ford Focus
- Sending videos of in-game streaming of gaming account username [YT]Kill_Shot_Live (The letters “YT” possibly meaning YouTube)
- Sending photos and videos of a black cat named “Toothless” with green eyes and blue collar
- Sending a screenshot of an iPhone screen with a black and white anime style drawing and showing “Metro by T-Mobile” service provider.
- Stating they play Call of Duty Cold War

16. On December 6, 2022, personnel from HSI Detroit executed a federal search warrant at England’s residence in Inkster, Michigan. England was encountered at the residence.

17. HSI Detroit SA David Alley and Trainer spoke with England regarding the nature of the search warrant. England agreed to speak with law enforcement. England was informed he was not under arrest at this time. England was read his *Miranda* rights and stated he understood his rights and was willing to speak to HSI agents. This interview was recorded in its entirety. England made the following pertinent, non-verbatim statements:

- a. England stated he lived at his residence for 7-10 years.
- b. England stated his telephone number was 313-802-9779, that he had that phone number for one or two years, and his phone carrier was Metro PCS by T Mobile.
- c. England stated he had an iPhone XR and a Samsung Galaxy. He stated the iPhone has a Superman case and was on his bed in his bedroom that was upstairs to the right in the residence.
- d. England provided the passcode for both the iPhone and Samsung Galaxy phones.
- e. England confirmed his username for gaming was “Kill_Shot_LiveYT”, and stated he played Call of Duty Cold War.
- f. England stated he had two Snapchat accounts with usernames “strongsquad98” and “Jack Jones”. England stated there were

numbers in the “Jack Jones” username, but he could not remember what the numbers were.

g. England stated he had random links containing child pornography on his cell phone. He stated someone kept sending him links on the application Telegram. He did not know what the links were so he opened them, saw they contained child pornography and went back to playing games.

h. England stated he chatted with minors on the “Jack Jones” Snapchat account and asked the females to send images and videos of their breasts, vagina and buttocks.

i. England stated he would sometimes ask the ages of the minors and continue to ask for sexually explicit images and videos after learning their ages.

j. England stated he would sometimes tell the minors to use their fingers or objects such as hairbrushes, markers, pens and pencils to touch themselves.

k. England stated he had approximately 50 images of child pornography.

l. England stated he traded sexually explicit images and videos of minors with other people in exchange for sexually explicit images and videos of other minors on Snapchat.

- m. England stated he bought a dildo on Amazon for a 15-year-old female, sent it to her and asked her to use it on herself. England has videos of this occurring.
- n. England stated he asked a few minors to send nudes for “robux”. England stated he would meet minors on the website “Omegle.com” then move to Snapchat. He stated he would use the words “robux”, “youtube” and “Minecraft” to find people to be connected with on Omegle. If the person said they like robux, England would ask them “to do stuff” for the robux.
- o. England stated if the minors listened to him and sent what he asked for, he would send them the code for \$25 in robux. If they didn’t listen, he would only send them \$10 in robux. He stated the last time he sent robux for nudes was a few months ago.
- p. England stated the youngest minor he had chatted with was 10-11 years old, and that he was also chatting with minors who were 13-16 years old.
- q. England stated his vehicle was the Ford Focus that was parked in front of the residence.
- r. England stated his sister had a black cat that used to stay at the residence before she moved out and took it with her.

18. In a secondary interview, England made the following pertinent statements under oath:

- a. England stated he chats with people on Robux and Omegle.
- b. England asks for a panty picture first to see if it is a female then he asks for nudes
- c. England stated he chatted with minors ages 10-15 and it switched to 10-16 when he got older.
- d. England stated he would ask to see the females genitalia and tell them to open it up.
- e. England has used Omegle to trade child pornography.

19. A Samsung phone was seized from the residence. A forensic preview of that phone showed that England is a member of a Telegram group that is sharing child pornography. The username “Daddy Dee” and phone number “313-802-9779” are visible in the user profile.

20. A conversation was observed between November 2-7 with a user believed to be England and an unknown person. The user believed to be England states the links didn’t work and asked an unknown user for any new stuff. An unknown user sends two links to the website “Mega.nz”. The content of these links is unknown. The user believed to be England then asks the unknown user if they “have any cp sex vids links”.

III. CONCLUSION

21. Your Affiant respectfully submits that there is probable cause to believe that Dimon Leon England violated Title 18, United States Code, Sections 2242(b), which makes it a crime for any person to utilize the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States to knowingly persuade, induce, entice, or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or to attempt to do so; as well as Title 18, United States Code, Sections 2251(a), 2252A(a)(2) and 2252A(a)(5)(B), which make it a crime for any person to knowingly produce, receive, or possess child pornography that has been mailed, shipped, or transported in interstate or foreign commerce by any means, including by computer.

22. Wherefore by this affidavit and application, Affiant requests that the Court authorize the issuance of a criminal complaint and arrest warrant for **Dimon Leon England**.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Laura L. Trainer", written over a horizontal line.

Laura L. Trainer, Special Agent
Department of Homeland Security
Homeland Security Investigations

Sworn to before me and signed in my presence
and/or by reliable electronic means

A handwritten signature in black ink, appearing to read "Jonathan J.C. Grey", written over a horizontal line.

HON. JONATHAN J.C. GREY
UNITED STATES MAGISTRATE JUDGE

Date: December 6, 2022